

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TROIKA MEDIA GROUP, INC., TROIKA-MISSION :  
HOLDINGS, INC., MISSIONCULTURE LLC, and :  
MISSION MEDIA USA INC., :

Plaintiffs,

-against-

NICOLA STEPHENSON, JAMES STEPHENSON  
and ALLMAC LLC,

Defendants.  
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Index No.: 1:19-cv-00145-ER

**DECLARATION OF  
DEAN R. NICYPER  
IN SUPPORT OF PLAINTIFFS'  
SECOND MOTION FOR  
CONTEMPT AND TO  
BROADEN INJUNCTIVE RELIEF**

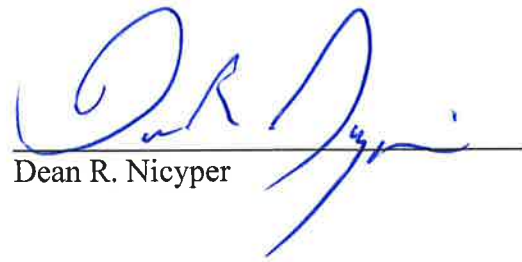
STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF NEW YORK                )

**DEAN R. NICYPER** respectfully submits this declaration, based on personal knowledge, stating as follows:

1. I am an attorney admitted in the State of New York and in this Court, and I am a partner at Withers Bergman LLP, counsel for Plaintiffs in this action.
2. I respectfully submit this Declaration in support of Plaintiffs' motion to hold Nicola Stephenson in contempt of this Court's January 7, 2019 temporary restraining order, and in support of Plaintiffs' motion to broaden the requested preliminary injunction against Nicola Stephenson ("NS") and James Stephenson ("JS"), in order to address any and all interference by NS and JS with any of the affiliated TMG and Mission Media ("MM") companies' business, assets, and personnel. I make this affirmation based on my personal knowledge.
3. There have been no prior applications for the relief requested in this motion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 5, 2019

  
Dean R. Nicyper